IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MICK HAIG PRODUCTIONS, E.K., HATTINGER STR. 88 D-44789 BOCHUM, GERMANY, PLAINTIFF, VS. DOES 1 - 670 DEFENDANTS.	§ § § § § § § § § § §	C.A. NO.: 3:10-cv-01900-N

NOTICE OF DISMISSAL WITH PREJUDICE

In accordance with Rule 41 of the Federal Rules of Civil Procedure, Plaintiff hereby gives notice of dismissal with prejudice against all Defendants in this case. This notice has been submitted prior to any defendant having filed an answer or motion for summary judgment in this case.

This case was filed on September 21, 2010. Shortly thereafter, on September 30, 2010, Plaintiff filed a Motion for Expedited Discovery that requested leave to take discovery prior to a Rule 26(f) conference. Absent such discovery, Plaintiff has no means whatsoever to seek redress for the substantial harm it has suffered due to Defendants' collective and egregious acts of copyright infringement.

Subsequent to Plaintiff's filing of said Discovery Motion, the Court appointed attorneys ad litem for the Defense. Rather than choosing competent local counsel experienced in intellectual property law, the Court appointed a trio of attorneys renowned for defending internet piracy and renowned for their general disregard for intellectual property law. Additionally, instead of instructing these attorneys to engage Plaintiff's counsel in a discovery conference which would allow the case to move forward, the Court ordered attorneys for the Defense to respond to Plaintiff's

Motion, for which the Court has yet to make a ruling.

The response of the Defense was largely beyond the scope of the Discovery Motion at issue, raising defenses as absurd as the notion that a Defendant's choice of what movie to illegally download from the internet is "protected speech" under the First Amendment. Moreover, the Defense provided no alternatives for Plaintiff to cure the harm inflicted on it by Defendants.

Now, four months after the initial filing of this case, with little chance of discovery in sight, Plaintiff feels it has lost any meaningful opportunity to pursue justice in this matter. As such, Plaintiff has notified all relevant internet service providers that this case is being dismissed and hereby notifies the Court of the same.

Respectfully Submitted,
Mick Haig Productions, E.K.

DATED: January 28, 2011

s/ E. F. Stone

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